

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
DANY BATISTA,

Plaintiff,

-against-

DECLARATION IN FURTHER  
SUPPORT

15 Civ. 09649 (AT) (DB)

LG CLEANERS, INC. (d/b/a LG CLEANERS & TAYLOR  
SHOP), LUIS GARCIA, and ORLANDO GARCIA,

Defendants.  
-----x

Gregory P. Mouton, Jr., Esq., an attorney duly admitted to practice in the Courts of New York, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the following statements are true:

1. I am the attorney for Defendants L G Cleaners Inc., Luis Garcia, and Orlando Garcia in the instant matter. As such, I am familiar with the facts and circumstances of this action.

2. This declaration is respectfully submitted in compliance with the Court's July 29, 2016, Order and further in support of the application of Law Office of Gregory P. Mouton, Jr., LLC ("Counsel") to withdraw as counsel to Defendants.

3. On July 8, 2016, the undersigned informed Defendants L G Cleaners Inc., Luis Garcia, and Orlando Garcia during an in-person meeting that corporations must appear before the Court through counsel.

4. On July 8, 2016, the undersigned informed Defendants L G Cleaners Inc., Luis Garcia, and Orlando Garcia during an in-person meeting that, should Defendant L G Cleaners Inc. not retain counsel, the Court may enter a default judgment against Defendant L G Cleaners Inc. for failure to defend itself in this matter.

5. On July 14, 2016, the undersigned served Defendant L G Cleaners Inc. with a copy of the Notice of Motion (Docket Entry No. 21) and Memorandum of Law In Support (Docket Entry No. 22) for Law Office of Gregory P. Mouton, Jr., LLC's motion for leave to withdraw as attorney, by serving Defendant L G Cleaners Inc. by USPS First-Class Mail at 110 West 168th Street, Bronx, NY 10452.

6. On July 14, 2016, the undersigned served Defendant Luis Garcia with a copy of the Notice of Motion (Docket Entry No. 21) and Memorandum of Law In Support (Docket Entry No. 22) for Law Office of Gregory P. Mouton, Jr., LLC's motion for leave to withdraw as attorney, by serving Defendant Luis Garcia by USPS First-Class Mail c/o L G Cleaners Inc. at 110 West 168th Street, Bronx, NY 10452. Said address is the address the undersigned regularly corresponded with Defendant Luis Garica.

7. On July 14, 2016, the undersigned served Defendant Orlando Garcia with a copy of the Notice of Motion (Docket Entry No. 21) and Memorandum of Law In Support (Docket Entry No. 22) for Law Office of Gregory P. Mouton, Jr., LLC's motion for leave to withdraw as attorney, by serving Defendant Orlando Garcia by USPS First-Class Mail c/o L G Cleaners Inc. at 110 West 168th Street, Bronx, NY 10452. Said address is the address the undersigned regularly corresponded with Defendant Orlando Garica.

8. On July 22, 2016, the undersigned served Defendant L G Cleaners Inc. with a copy of the Sealed Declaration In Support (Docket Entry No. 24) for Law Office of Gregory P. Mouton, Jr., LLC's motion for leave to withdraw as attorney, by serving Defendant L G Cleaners Inc. by USPS First-Class Mail at 110 West 168th Street, Bronx, NY 10452.

9. On July 22, 2016, the undersigned served Defendant Orlando Garcia with a copy of the Sealed Declaration In Support (Docket Entry No. 24) for Law Office of Gregory P. Mouton, Jr., LLC's motion for leave to withdraw as attorney, by serving Defendant Orlando Garcia by USPS First-Class Mail c/o L G Cleaners Inc. at 110 West 168th Street, Bronx, NY 10452.

10. On July 22, 2016, the undersigned served Defendant Luis Garcia with a copy of the Sealed Declaration In Support (Docket Entry No. 24) for Law Office of Gregory P. Mouton, Jr., LLC's motion for leave to withdraw as attorney, by serving Defendant Luis Garcia by USPS First-Class Mail c/o L G Cleaners Inc. at 110 West 168th Street, Bronx, NY 10452.

11. On August 9, 2016, the undersigned served Defendant L G Cleaners Inc. with a copy of the Court's Order dated July 29, 2016, (Docket Entry No. 25) by serving Defendant L G Cleaners Inc. by USPS First-Class Mail at 110 West 168th Street, Bronx, NY 10452.

12. On August 9, 2016, the undersigned served Defendant Luis Garcia with a copy of the Court's Order dated July 29, 2016, (Docket Entry No. 25) by serving Defendant Luis Garcia by USPS First-Class Mail c/o L G Cleaners Inc. at 110 West 168th Street, Bronx, NY 10452.

13. On August 9, 2016, the undersigned served Defendant Orlando Garcia with a copy of the Court's Order dated July 29, 2016, (Docket Entry No. 25) by serving Defendant Orlando Garcia by USPS First-Class Mail c/o L G Cleaners Inc. at 110 West 168th Street, Bronx, NY 10452.

14. Given the foregoing, it is respectfully requested that the Court allow Counsel to withdraw as attorneys for Defendants.

Dated: New York, New York  
August 9, 2016

/s/  
Gregory P. Mouton, Jr., Esq.

Law Office of Gregory P. Mouton, Jr., LLC  
*Attorneys for Defendants L G Cleaners Inc., Luis  
Garcia, and Orlando Garcia*  
305 Broadway, 14th Floor  
New York, NY 10007  
Phone & Fax: (646) 706-7481

15 Civ. 09649 (AT) (DB)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

DANY BATISTA,

Plaintiff,

-against-

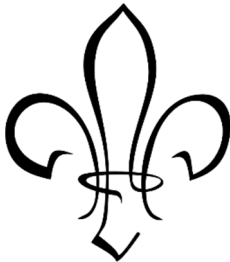
LG CLEANERS, INC. (d/b/a LG CLEANERS & TAYLOR SHOP), LUIS GARCIA, and  
ORLANDO GARCIA,

Defendants.

---

DECLARATION IN FURTHER SUPPORT

---



**LAW OFFICE OF GREGORY P. MOUTON, JR., LLC**

Gregory P. Mouton, Jr., Esq., *Principal*

305 Broadway, 14th Floor

New York, NY 10007

Phone & Fax: (646) 706-7481